REMARKS

Claims 1, 2, 5-16, 26-28, and 31-36 are pending in the application.

Claims 1, 2, 5-16, 26-28, and 31-36 have been rejected.

New claims 37 and 38 have been added.

Rejection of Claims under 35 U.S.C. § 103

Claims 1-2, 5-8, 11-16, 26-28 and 31-34 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable by U.S. Patent No. 7,216,133 issued to Wu et al. ("Wu") in view of U.S. Patent Application Publication 2004/0267829 listing Hirakawa et al. as inventors ("Hirakawa").

While not conceding that the cited references qualify as prior art, but instead to expedite prosecution, Applicants have chosen to respectfully disagree and traverse the rejection as follows. Applicants reserve the right, for example, in a continuing application, to establish that the cited references, or other references cited now or hereafter, do not qualify as prior art as to an invention embodiment previously, currently, or subsequently claimed.

Claims 9-10 and 35-36 stand rejected under 35 U.S.C. § 103(a) as purportedly being unpatentable by U.S. Patent No. 7,216,133 issued to Wu et al. ("Wu") in view of U.S. Patent Application Publication 2004/0267829 listing Hirakawa et al. as inventors ("Hirakawa") as applied to claims 1 and 7 above, and further in view of U.S. Patent No. 6,088,697 issued to Crockett et al. ("Crockett").

Applicants have amended each of the independent claims to recite features that are not taught or fairly suggested in the combination of Wu and Hirakawa. For example, independent Claim 1 now recites synchronizing the first and second mirrors after storing the first write information in the entry of the first tag table and after storing the second write information in the entry of the second tag table. The Office Action argues that Wu teaches the claimed acts of storing first and second write information in entries of first and second tables. However, the sections of Wu cited in the Office Action that allegedly teach the claimed acts of storing also describe that the acts of storing are performed during a process for synchronizing replicas. In other words, the cited sections of Wu fail to teach or fairly suggest synchronizing **after** storing first and second write information in entries of the first and second tag tables. As such, Applicants assert that independent Claim 1 is patentably distinguishable. The other independent claims have been amended to recite the same or similar features argued above, and are patentably distinguishable for this reason.

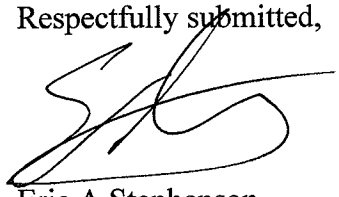
New Claims 37 and 38 have been added to the Application. Support for these claims can be found within paragraph [0033] of the instant Application.

CONCLUSION

In view of the foregoing amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to Deposit Account 502306.

Respectfully submitted,



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